

**IV. Remarks:**

Claims 1-10, 21, 23-27, and 31-32 are pending. Claims 28-30 have been canceled. Claims 1, 21, 23, and 31 have been amended.

**Rejections under 35 U.S.C. § 102**

The pending claims stand rejected under § 102(b) as being anticipated by U.S. Patent No. 6,279,007 to Uppala ("Uppala"). As the PTO provides in MPEP § 2131, "[t]o anticipate a claim, the reference must teach every element of the claim...." Therefore, the Uppala patent must disclose all of the elements of the claims to sustain the rejections. Accordingly, Applicant respectfully traverses these rejections.

Claim 1 is reproduced below to emphasize the italicized portions:

1. A method of creating a relational database so that multiple simultaneous hierarchies can be defined without needing dedicated database relationships between objects in the multiple hierarchies, wherein the relational database includes a plurality of objects *each having an associated data to be accessed*; said method comprising:

forming a first database table having a plurality of entries, *each entry representing an object with an associated data to be accessed*; and

forming a second database table having a plurality of entries, each entry defining a relationship between said plurality of objects, wherein each entry is associated with at least one of the multiple hierarchies.

In addition to the highlighted portion in claim 1 above, is in contrast to Uppala, which creates identifying tables or "indexing" tables to access the data, but these identifying tables do not actually contain the data to be accessed. For instance, at Col. 9, lines 1-11, Uppala states:

Referring first to FIG. 8, an exemplary embodiment of the invention is shown as data warehouse manager 811 residing in a server 810 to provide an interface between a data warehouse 813 on the server and an application 801 in a client 800. *The data warehouse 813 contains data that can be accessed through hierarchical value identifiers. The data warehouse manager 811 creates and maintains the three data structures described above for the data in the data warehouse 813.* The three data structures are stored in the data warehouse 813. The client application 801 uses the methods of the data warehouse manager 811 to store and retrieve data from the data warehouse 813.

Thus, the data can be accessed using the identifiers, but the data is not stored in the data structures. Uppala uses identifiers or indexes that allow the data in the data warehouse to be accessed. This is in contrast to the claimed invention, where the member or node table actually contains the data to be accessed.

MPEP § 2131 requires that "[t]he identical invention must be shown in as complete detail as is contained in the ... claim." Claim 1 recites: forming a first database table having a plurality of entries, each entry representing an object with an associated data to be accessed. Independent claims 21, 23 and 31 have also been amended so that it is clear that the first or member database table includes the associated data to be accessed.

In contrast, nowhere does Uppala teach or suggest a hierarchical structure that actually contains the data to be accessed. Accordingly, Uppala fails to disclose or suggest all the claimed elements or the manner in which they interconnect as required by MPEP § 2131. Thus, modified claims 1, 21, 23, and 31 are allowable over the Uppala patent.

The dependent claims depend from and further limit the independent claims and so are allowable as well.

### Conclusion

As a result of the foregoing, it is respectfully asserted that all the claims in the Application are in condition for allowance. Should the Examiner deem that any further amendment is desirable to place this application in condition for allowance, the Examiner is invited to telephone the undersigned at the below listed telephone number.

Respectfully submitted,



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